

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SUZHOU GOOD-ARK ELECTRONICS CO., LTD.,
derivatively on behalf of
GOOD-ARK SEMICONDUCTOR USA CORP.,

Plaintiff,

v.

DANIELLE JUNKINS, JOHN MARULLO, BRETT
SINGER, and GSC USA INC.,

Defendants,

and

GOOD-ARK SEMICONDUCTOR USA CORP.,
Nominal Defendant.

Civil Action No. 2:25-cv-02931

Honorable Magistrate Judge
Steven Tiscione

**NOTICE OF PLAINTIFF'S EX
PARTE APPLICATION FOR A
TEMPORARY RESTRAINING
ORDER AND ORDER TO
SHOW CAUSE FOR
PRELIMINARY INJUNCTION
AND APPOINTMENT OF
TEMPORARY RECEIVER**

PLEASE TAKE NOTICE that upon the accompanying Memorandum of Law, the Declaration of Wenhao Wu, the Declaration of Yong Chen, and the exhibits attached thereto, Plaintiff Suzhou Good-Ark Electronics Co., Ltd. ("Plaintiff"), by and through its undersigned counsel, moves this Court *ex parte* for entry of a Temporary Restraining Order against Defendants Danielle Junkins, John Marullo, Brett Singer, and GSC USA Inc. under Rule 65 of the Federal Rules of Civil Procedure.

I. Relief Sought

Plaintiff seeks a Temporary Restraining Order ("TRO") to enjoin Defendants Danielle Junkins, John Marullo, Brett Singer, and GSC USA Inc. from:

1. Using, registering, or otherwise exploiting the “Good-Ark” and “Good-Ark Semiconductor” trademarks without Plaintiff’s express written consent.
2. Competing with Good-Ark Semiconductor USA Corp. (“Good-Ark USA”) by diverting business opportunities or assets.
3. Transferring or disposing of any corporate assets or intellectual property belonging to Good-Ark USA or Plaintiff without prior court approval.
4. Obstructing the governance processes of Good-Ark USA.
5. Failing to preserve all documents and records related to the incorporation of GSC USA Inc. and the use of the “Good-Ark Semiconductor” trademark.

II. Grounds for Relief

The grounds for this motion are as follows:

1. Plaintiff has demonstrated a likelihood of success on the merits, including claims of breach of fiduciary duties, unfair competition, and trademark infringement.
2. Plaintiff will suffer irreparable harm absent preliminary relief, as Defendants’ actions threaten the integrity of Plaintiff’s brand and Good-Ark USA’s corporate governance.
3. The balance of hardships tips in Plaintiff’s favor, as Defendants’ unauthorized activities are unlawful and self-inflicted.
4. The public interest supports granting the relief to prevent consumer confusion and protect trademark rights and to ensure corporate governance integrity, protecting shareholder rights, and maintaining trust in the business environment, which are essential for economic stability and fair market practices.

III. Supporting Papers

This motion is supported by the following documents:

1. Plaintiff's Memorandum of Law in Support of Application for a Temporary Restraining Order and Order to Show Cause for Preliminary Injunction and Appointment of Temporary Receiver.
2. Declaration of Wenhao Wu, detailing the facts and circumstances surrounding the Defendants' misconduct.
3. Declaration of Yong Chen, setting forth the requirement of F.R.C.P. Rule 65(b)(1)(B).
4. Declaration of Qing (Nina) Wang in support of Appointment of Temporary Receiver.
5. Exhibits to the declarations, including the verified complaint.

Dated: May 29, 2025

Respectfully submitted,

/s/ Yong Chen

Yong Chen
LIU, CHEN & HOFFMAN LLP
14 Penn Plaza, Ste 2020
New York, NY 10122
(212) 547-6694 (Tel)
(212) 547-6692 (Fax)
ychen@ambizlaw.com
Attorney for Plaintiff